

Brian P. Berson, Esq.

California State Bar No. 130249

Law Offices of Brian P. Berson

235 Montgomery St., Suite 625

San Francisco, CA 94104

brian@bersonlaw.net

Telephone: (415) 788-2707

Facsimile: (415) 392-5275

Counsel for Defendant **JACQUILINE HOEGEL**

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) NO. CR 12-0111-EMC-2
)
Plaintiff,) STIPULATION AND [PROPOSED]
) ORDER TO WAIVE DEFENDANT'S
) APPEARANCE
JACQUILINE HOEGEL.)
)
Defendant.)
_____)

Based on defense counsel's representation that he has been in regular contact with Defendant Hoegel, that the nature of the scheduled February 6, 2013 hearing has been discussed with her, that both parties will be seeking a several month continuance based on complexity of the case and AUSA Brown's impending maternity leave, and that Ms. Hoegel would prefer not to attend the hearing unless the Court requires, counsel for the United States and counsel for Defendant Jacqueline Hoegel agree and stipulate that Defendant Hoegel's appearance at the status hearing on February 6, 2013 is unnecessary and may be waived, should the Court permit.

1 SO STIPULATED:

2
3 Date: January 24, 2013

_____/s_____
BRIAN P. BERSON
ATTORNEY FOR JACQUILINE HOEGEL

4
5
6 Date: January 24, 2013

_____/s_____
TRACIE BROWN
ASSISTANT U.S. ATTORNEY

7
8
9
10 **[PROPOSED] ORDER**

11 Based on the foregoing, the Court waives the appearance of
12 Defendant Jacqueline Hoegel at the February 6, 2013 status hearing.
13 However, defense counsel shall notify Ms. Hoegel of the next
14 scheduled court date, which she will be required to attend unless
15 the Court orders otherwise in the future.
16

17
18 SO ORDERED:

19 1/25/13
20 Date: _____

